

November 23, 2011

National Advisory Committee on Institutional Quality and Integrity  
c/o Melissa Lewis  
Executive Director  
1990 K Street NW, Room 8060  
Washington, DC 20006

Dear Committee Members:

The National Advisory Committee on Institutional Quality and Integrity (NACIQI) draft report, issued on October 18, 2011, notes that NACIQI is considering “what is working (and not working)” in the current system of recognition and accreditation. We believe that it is important to view accreditation not as something that is “broken” but rather as an effective process that can be further strengthened to provide even greater value to students and society.

Accreditation has long served as the primary vehicle for assuring and improving quality in higher education. Accreditation’s fundamental principles provide the grounding for a process that involves careful examination of colleges, universities and programs. The peer review process is at the heart of accreditation. This independent, peer/professional review of higher education quality establishes confidence that an institution or program meets at least threshold standards of quality and engenders trust that college or university credentials or degrees will be respected. We need to preserve the key characteristics of peer review, academic leadership, institutional autonomy, recognition of institutional mission and academic freedom that are integral to higher education accreditation.

While accreditation has functioned effectively for more than 100 years, it has not been static. Accreditation modifies its policies and procedures as needed, in response to innovations in higher education or changes to law or regulation. When such changes are needed, the academy itself should be in charge of designing and implementing these changes, not the U.S. Department of Education (USDE) or NACIQI.

The relationship between accreditation and the federal government should be one of balance. Accreditation should be accountable to government; however, government directing or prescribing accreditation standards is inappropriate to this balanced relationship. “Holding accreditors accountable” is about the government focusing primarily on evidence that these organizations are meeting federal recognition standards. It does not stipulate how the standards are met; this is up to the accreditor.

Regarding the roles and responsibilities of the federal government and accreditation:

- It is inappropriate for USDE to be involved in designing accreditation itself, setting quality standards, setting standards for institutional improvement or directing students in making educational choices. This is the province of accreditation and the academy.
- It is also inappropriate for NACIQI to be involved in the activities listed above. Again, this is the province of accreditation and the academy.
- Accrediting organizations should not be held responsible for individual institutions; the failure of an institution to uphold an accreditor’s standards should not trigger action against the accreditor.

Several options outlined in the draft report merit further amplification and discussion:

- A review of USDE's data needs would be a very positive step, to determine how data gathering and reporting requirements can be revised and perhaps judiciously reduced to make them less burdensome on accrediting organizations and institutions.
- A similar review of USDE's regulations governing the recognition of accrediting organizations is desirable, to identify modifications and consider eliminations of some requirements to make these regulations less intrusive.
- A review and clarification of the responsibilities of each member of the triad is desirable.
- It may be appropriate and desirable that accrediting organizations be indemnified to reduce legal risks and burdens assumed by making accrediting decisions.

We urge NACIQI to look at both the intended and unintended consequences of any changes to accreditation regulations – as well as analyzing the potential cost in time or money for accreditors or the institutions and programs they accredit – before recommending that any of the options presented in the draft report be pursued.

If we treat accreditation not as a broken enterprise but as an effective process that can and should be reviewed and modified – with the academy maintaining its leadership and working with the federal government – we strengthen accreditation's value to students and society. We look forward to an ongoing discussion with NACIQI and USDE on these issues.

Sincerely,



Judith Eaton  
President

On behalf of:

ABET, Inc.  
Accreditation Council for Business Schools and Programs  
Accreditation Council for Pharmacy Education  
Accrediting Commission of Career Schools and Colleges  
Accrediting Council for Independent Colleges and Schools  
American Culinary Federation's Education Foundation, Inc., Accrediting Commission  
American Occupational Therapy Association, Accreditation Council for Occupational Therapy  
American Physical Therapy Association, Commission on Accreditation in Physical Therapy  
American Psychological Association, Commission on Accreditation  
American Speech-Language Hearing Association, Council on Academic Accreditation in Audiology and Speech-Language Pathology  
Association for Biblical Higher Education, Commission on Accreditation  
Association for Clinical Pastoral Education, Inc., Accreditation Commission  
Association of Advanced Rabbinical and Talmudic Schools, Accreditation Commission  
Association of Specialized and Professional Accreditors  
Aviation Accreditation Board International  
Commission on Accreditation of Allied Health Education Programs  
Council for Higher Education Accreditation

Council on Rehabilitation Education, Commission on Standards and Accreditation  
Distance Education and Training Council, Accreditation Commission  
International Assembly for Collegiate Business Education  
Joint Review Committee on Education Programs in Nuclear Medicine Technology  
Joint Review Committee on Education Programs in Radiologic Technology  
Middle States Association of Colleges and Schools, Middle States Commission on Higher Education  
National Council for Accreditation of Teacher Education  
New England Association of Schools and Colleges, Commission on Institutions of Higher Education  
North Central Association of Colleges and Schools, The Higher Learning Commission  
Southern Association of Colleges and Schools, Commission on Colleges  
Western Association of Schools and Colleges, Accrediting Commission for Community and Junior  
Colleges  
Western Association of Schools and Colleges, Accrediting Commission for Senior Colleges and  
Universities